

**REMARKS**

Claims 1-42 are pending in this application. By this Amendment, claims 8, 9, 20, 21, 32 and 33 are amended. Reconsideration of the application is respectfully requested.

The Office Action rejects claims 1-42 under 35 U.S.C. §103(a) over Nagle (U.S. Patent No. 6,067,096) in view of Moore et al. ("Collision Detection and Response for Computer Animation," Computer Graphics, Volume 22, Number 4, August 1988) (hereinafter, "Moore"). The rejection is respectfully traversed.

Neither Nagle nor Moore, alone or in combination, discloses, teaches or suggests an image generation system that includes at least generating a motion of an object formed by a plurality of parts, by moving an Nth part through a physical simulation based on hit information when the Nth part is hit and sequentially transmitting the hit information to the N+1th, N+2th, N+3th .... parts so that the N+1th, the N+2th, the N+3th .... parts are sequentially moved through a physical simulation based on the transmitted hit information, as recited in independent claims 1, 13 and 25. Moreover, neither Nagle nor Moore, alone or in combination, discloses, teaches or suggests an image generation system that includes playing a motion of an object formed by a plurality of parts based on pre-stored motion data, as recited in independent claims 8, 9, 20, 21, 32 and 33. Finally, neither Nagle nor Moore, alone or in combination, discloses, teaches or suggests an image generation system and method that includes causing an object to perform a connecting motion which connects a motion generated by a physical simulation with a motion played based on a motion data, as recited in independent claims 37-42.

Specifically, Nagle teaches a method of computer operation and a software system for operating a computer to generate realistic collisions between animated bodies (Abstract). However, although Nagle teaches joint movement (col. 10, lines 33-65), Nagle does not teach that the movement is transmitted to other parts of the body. In other words, although Nagle

teaches movement of one part of the body when it is hit (col. 8, lines 14-59 and col. 11, lines 7-30), Nagle does not teach the motion of the other parts that are related to the part being collided with. In fact, Nagle specifically teaches that "body pairs which are too far apart to be in contact are eliminated" (col. 8, lines 38-39). As such, Nagle fails to disclose or suggest that information is transmitted to the N+1th, N+2th, N+3th .... parts so that the N+1th, the N+2th, the N+3th .... parts are sequentially moved, as recited in independent claims 1, 13 and 25. Moreover, Moore fails to overcome these deficiencies of Nagle. As such, the asserted combination of Nagle and Moore fails to disclose or render obvious the features of independent claims 1, 13 and 25.

Also, Nagle fails to disclose or suggest an image generation system and associated method that includes playing a motion of an object formed by a plurality of parts based on pre-stored motion data, as recited in independent claims 8, 9, 20, 21, 32 and 33. Nagle only teaches a processor which plays motion data generated by the physical simulation of realistic collisions between animated bodies (Abstract). Therefore, the processor in Nagle does not play pre-stored motion data. The motion data in Nagle is not pre-stored in a memory, but is generated by the physical simulation. Moreover, Figs. 34 and 35 in Nagle, relied on by the Office Action, only teaches switching processes among plays of motion data by physical simulation. Accordingly, Nagle is silent about switching processing from playing motion data generated by physical simulation to playing pre-stored motion data, as recited in independent claims 8, 9, 20, 21, 32 and 33. Moreover, Moore fails to overcome these deficiencies of Nagle. As such, the asserted combination of Nagle and Moore fails to disclose or render obvious the features of independent claims 8, 9, 20, 21, 32 and 33.

Finally, the Office Action acknowledges that Nagle does not teach "causing to perform a connecting motion which connects a motion generated by the physical simulation with a motion plate based on the motion data" (Office Action, page 8, lines 16-18).

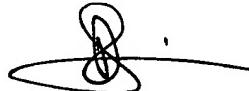
Moreover, Moore only teaches that "the solution allows the links of an articulated object to collide with other links of the same object over the other object entirely" (Moore, page 295, col. 1, articulated rigid bodies). Accordingly, Moore does not teach a connecting motion that connects a motion generated by a physical simulation with a motion plate based on motion data. Moore teaches rigid objects that enter in collision with each other, but does not teach a pre-stored motion data in each of the rigid objects. Accordingly, Moore does not teach causing the object to perform a connecting motion that connects a motion generated by a physical simulation with a motion played based on motion data. As such, Moore fails to cure the deficiencies of Nagle with respect to claims 37-42.

Accordingly, the asserted combination of Nagle and Moore would not have resulted in the subject matter of independent claims 1, 8, 9, 13, 20, 21, 25, 32, 33 and 37-42. As such, these independent claims, and their dependent claims, are patentable over Nagle and Moore. Accordingly, withdrawal of the rejection of the claims under 35 U.S.C. §103(a) is respectfully requested.

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance of claims 1-42 are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,



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